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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

RIKI ROASH, individually,

Case No. 2:19-CV-00035-GMN-BNW

Plaintiff,

vs.

AUTOMOBILE INSURANCE COMPANY
OF HARTFORD, CONNECTICUT, a foreign
corporation; DOES I through X, inclusive and
ROE CORPORATIONS, I through X,
inclusive,

Defendants,

STIPULATION TO EXTEND THE DATE FOR PLAINTIFF TO FILE IT'S RESPONSE
TO DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS (ECF 36)
(First Request)

Plaintiff and Defendant have stipulated and agreed to a fourteen (14) day extension of time from May 15, 2020 to May 29, 2020 for Plaintiff to file it's Opposition to Defendant's Motion for Judgment on the Pleadings (ECF 36) filed on May 1, 2020. The reasons supporting this stipulation are as follows: Given the unfortunate circumstances associated with COVID-19, Plaintiff's counsel has invoked limited and remote working conditions for its office. Counsel requires additional time to have meaningful discussions with client(s) and file review as to provide the Court a complete outline of facts and issues. These unforeseen circumstances has placed a convergence on counsel's commitments also necessitating this request. This instant stipulation comes fewer than 21 days before the expiration of the initial expert disclosure deadline. Local rule 26-4 requires that the

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1 stipulations coming fewer than 21 days before the expiration of a deadline demonstrate excusable
2 neglect. The parties contend that good cause and excusable neglect exist to grant the extension due
3 to the logistical difficulties that have arisen for Plaintiff's counsel is shifting its entire practice
4 remotely due to COVID-19 considerations.

5 This is the first extension of time requested by the Parties related to this Motion, which is
6 made in good faith and not for purposes of delay.

7 Dated this 15th day of May, 2020.

Dated this 15th day of May, 2020.

8 /s/ Jerome R. Bowen, Esq.
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Attorney for Plaintiff

/s/ Dylan P. Todd, Esq.
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Henderson, Nevada 89052
Attorney for Defendant

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14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated this 18 day of May, 2020.

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19 Gloria M. Navarro, District Judge
20 UNITED STATES DISTRICT COURT
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